

EXHIBIT “B”

Tom McGowan

From: Tom McGowan
Sent: Thursday, October 14, 2021 4:01 PM
To: 'Rodney Perry'
Subject: TFSB v. Manafort 21-cv-1400

Importance: High

Mr. Perry:

As you are aware, Defendant's responses to my client's documents demand were due yesterday. Your last minute request for an extension has not been granted. Please forward those responses immediately. Thank you.

Tom McGowan

Meltzer, Lippe, Goldstein & Breitstone, LLP
190 Willis Ave
Mineola, NY 11501
Phone 516-747-0300 Ext. 123
Fax 516-237-2893
www.meltzerlippe.com

New York City Office:
460 Park Avenue – 21st Floor
New York, NY 10022
Phone 212-201-1720



Tom McGowan

From: Tom McGowan
Sent: Friday, October 15, 2021 11:05 AM
To: 'Rodney Perry'
Subject: RE: TFSB v. Manafort 21-cv-1400

????????????

From: Tom McGowan
Sent: Thursday, October 14, 2021 4:01 PM
To: 'Rodney Perry' <RPerry@rshc-law.com>
Subject: TFSB v. Manafort 21-cv-1400
Importance: High

Mr. Perry:

As you are aware, Defendant's responses to my client's documents demand were due yesterday. Your last minute request for an extension has not been granted. Please forward those responses immediately. Thank you.

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Tom McGowan

From: Tom McGowan
Sent: Friday, October 15, 2021 11:43 AM
To: 'Rodney Perry'
Subject: The Federal Savings Bank v. Manafort 21-cv-1400
Attachments: 3093_001.pdf

Please see the attached. With full reservation of rights, please also advise the status of defendants' overdue responses to Plaintiff's document demand.

Tom McGowan

From: E Copy
Sent: Friday, October 15, 2021 11:45 AM
To: Tom McGowan <TomM@meltzerlippe.com>
Subject: Attached Image

Tom McGowan

From: Tom McGowan
Sent: Monday, October 18, 2021 11:10 AM
To: 'Rodney Perry'; Matthew Crowl
Subject: The Federal Savings Bank v. Manafort 21-cv-1400
Attachments: 3104_001.pdf

Importance: High

As per Plaintiff's responses to Defendants' document demand, attached are documents evidencing protective advances made by Plaintiff in connection with the Brooklyn premises.

As you are aware from my earlier communications, Defendants are in default of producing documents responsive to Plaintiff's document demand. Despite requests, and the fact that Defendants have not been granted an extension of time to respond to Plaintiff's document demands from the Court, you have yet to provide same. Please advise immediately whether it will be necessary for Plaintiff to move to compel and for sanctions.

Thank you.

Tom McGowan

From: E Copy
Sent: Monday, October 18, 2021 11:06 AM
To: Tom McGowan <TomM@meltzerlippe.com>
Subject: Attached Image

Tom McGowan

From: Tom McGowan
Sent: Wednesday, October 20, 2021 11:26 AM
To: 'Rodney Perry'; 'Matthew Crowl'
Subject: RE: The Federal Savings Bank v. Manafort 21-cv-1400

Mr. Perry

Your failure to respond to my several requests for Defendants to produce documents as required leaves me no choice but to move to compel and seek sanctions. Be guided accordingly.

Tom McGowan

From: Tom McGowan
Sent: Monday, October 18, 2021 11:10 AM
To: 'Rodney Perry' <RPerry@rshc-law.com>; Matthew Crowl <mcrowl@rshc-law.com>
Subject: The Federal Savings Bank v. Manafort 21-cv-1400
Importance: High

As per Plaintiff's responses to Defendants' document demand, attached are documents evidencing protective advances made by Plaintiff in connection with the Brooklyn premises.

As you are aware from my earlier communications, Defendants are in default of producing documents responsive to Plaintiff's document demand. Despite requests, and the fact that Defendants have not been granted an extension of time to respond to Plaintiff's document demands from the Court, you have yet to provide same. Please advise immediately whether it will be necessary for Plaintiff to move to compel and for sanctions.

Thank you.

Tom McGowan

From: E Copy
Sent: Monday, October 18, 2021 11:06 AM
To: Tom McGowan <TomM@meltzerlippe.com>
Subject: Attached Image

Tom McGowan

From: Tom McGowan
Sent: Wednesday, October 20, 2021 12:04 PM
To: 'Rodney Perry'
Cc: Matthew Crowl; Brendan Gerdes
Subject: RE: [EXTERNAL EMAIL] RE: The Federal Savings Bank v. Manafort 21-cv-1400

Mr. Perry

You have not been granted an extension of time and your deadline is passed. Since you will not produce, apparently abrogating the Court's role as to an extension of time, you leave me with no choice but to move and to seek sanctions.

Tom McGowan

From: Rodney Perry <RPerry@rshc-law.com>
Sent: Wednesday, October 20, 2021 12:01 PM
To: Tom McGowan <TomM@meltzerlippe.com>
Cc: Matthew Crowl <mcrowl@rshc-law.com>; Brendan Gerdes <bgerdes@rshc-law.com>
Subject: RE: [EXTERNAL EMAIL] RE: The Federal Savings Bank v. Manafort 21-cv-1400

Mr. McGowan,

As you know, on October 12, 2021, we filed a motion seeking additional time (until November 2, 2021) to respond to Plaintiff's request for production of documents that is still pending with the Court. Your insistence that Defendants serve responses to the requests in light of the pending motion for extension of time is completely unreasonable, especially since Plaintiff will not suffer any prejudice from the short extension requested, has itself failed to respond to Defendants' interrogatories, and has asserted baseless objections and refused to produce documents responsive to Defendants' document requests.

Given that you have not provided any rational basis for refusing to agree to the requested relief, Defendants plan to serve their responses to Plaintiff's document requests in accordance with the deadline requested in the October 12 motion.

Regards,

Rodney Perry
Direct: (312) 471-8731
Email: rperry@rshc-law.com



From: Tom McGowan <TomM@meltzerlippe.com>
Sent: Wednesday, October 20, 2021 10:26 AM

To: Rodney Perry <RPerry@rshc-law.com>; Matthew Crowl <mcrowl@rshc-law.com>

Subject: [EXTERNAL EMAIL] RE: The Federal Savings Bank v. Manafort 21-cv-1400

Mr. Perry

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From: Tom McGowan

Sent: Monday, October 18, 2021 11:10 AM

To: 'Rodney Perry' <RPerry@rshc-law.com>; Matthew Crowl <mcrowl@rshc-law.com>

Subject: The Federal Savings Bank v. Manafort 21-cv-1400

Importance: High

As per Plaintiff's responses to Defendants' document demand, attached are documents evidencing protective advances made by Plaintiff in connection with the Brooklyn premises.

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Thank you.

Tom McGowan

From: E Copy

Sent: Monday, October 18, 2021 11:06 AM

To: Tom McGowan <TomM@meltzerlippe.com>

Subject: Attached Image

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